

LAW OFFICES OF GILBERT C PARRIS, P.C.  
30 WALL STREET 8<sup>th</sup> floor  
NEW YORK, N.Y. 10005  
(212) 257-1236 (phone)  
(866) 368-4554 (fax)  
[Attnygil@gmail.com](mailto:Attnygil@gmail.com) (email)

APRIL 27, 2020

**VIA ELECTRONIC CASE FILING**

Hon Lewis Kaplan  
500 Pearl St  
New York, NY 10007

**MEMO ENDORSED**

Re: United States v. Warren Alexander  
Docket 1:20-cr-00037-LAK

Dear Judge Kaplan:

I am writing this Court to respectfully request an adjournment of the schedule as published by the Court. As the Court is aware, both myself and co-counsel cannot with our Clients given the COVID-19 protocol.

I spoke with AUSA Warren regarding a request for adjournment and he indicated the People would not object to such a request. I also spoke with co-counsel Julia Gatto who says she joins in this application.

To give the Court one example of just one of the challenges effecting our clients ability to review discovery, the disk drive which is needed to send to my client will not be arriving to the AUSAs office until May 11, 2020 according to amazon. It is imperative in this matter that we be able to speak with our clients after they have reviewed the discovery to effectively determine and file the appropriate motions. In light of the current challenges and need to effectively represent our clients, I am asking the motion schedule be set for late July, or in the alternative the Court set a status conference date in July to assess the current procedures which will be in place.

Respectfully submitted:

*Gilbert C. Parris*  
Gilbert C. Parris Esquire

Motion denied without prejudice. Schedule may be discussed at June 17 status conference. All counsel shall arrange with deputy clerk, Mr. Mohan, for telephone conference on that occasion.

CC: Via ECF  
AUSA Jacob Edward Warren  
AUSA David Robles

*Mr. Mohan*  
5/1/2020